



State of Utah

GARY R. HERBERT
Governor

GREG BELL
Lieutenant Governor

Department of
Environmental Quality

Amanda Smith
Executive Director

DIVISION OF RADIATION CONTROL
Rusty Lundberg
Director



January 20, 2011

**CERTIFIED MAIL
RETURN RECEIPT REQUIRED**

CH2M Hill Plateau Remediation Co.
Dean E. Nester, Project Manager
PO Box 1600 MS T4-08
Richland, WA 99352

RE: Generator Access Permit Number 0811005000; NOTICE OF VIOLATION AND NOTICE OF PROPOSED IMPOSITION OF CIVIL PENALTY

Dear Mr. Nester:

As a result of observations made during an inspection, it has come to the attention of the Utah Division of Radiation Control that CH2M Hill Plateau Remediation Co., shipped radioactive waste to the EnergySolutions, LLC disposal facility located at Clive, Utah that did not conform to the Utah Radiation Control Rules.

Specifically, the Division of Radiation Control is concerned that the apparent lack of management control regarding the implementation of your waste classification procedures resulted in significant violations of Utah Radiation Control Rules. Consequently, your required response to this letter should describe those actions planned or taken to improve the effectiveness of the management control of your waste classification procedures, with particular emphasis on measures currently being taken to prevent future waste classification violations.

Corrective actions taken to avoid future noncompliance are expected to be effective and lasting. Utah Administrative Code Subsection R313-14-15(2)(b)(ii) states, "ineffective licensee programs for problem identification or correction are unacceptable. In cases involving repeated poor performance in an area of concern or serious breakdown in management control, the Executive Secretary may apply the full enforcement authority."

A Notice of Violation and Notice of Proposed Imposition of Civil Penalties is enclosed. The particular violations are described in the enclosed Notice. Your attention to this matter is appreciated.

UTAH RADIATION CONTROL BOARD

Rusty Lundberg, Executive Secretary

RL:jf

Enclosure

cc: Jeff Ginsburg, EnergySolutions

195 North 1950 West • Salt Lake City, UT
Mailing Address: P.O. Box 144850 • Salt Lake City, UT 84114-4850
Telephone (801) 536-4250 • Fax (801) 533-4097 • T.D.D. (801) 536-4414

www.deq.utah.gov

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**UTAH RADIATION CONTROL BOARD
NOTICE OF VIOLATION
AND
NOTICE OF PROPOSED IMPOSITION OF CIVIL PENALTY**

CH2M Hill Plateau Remediation Company
P.O. Box 1600 MS T4-08
Richland, WA 99352

Generator Site Access Permit No. 0811 005 000

In a letter dated December 13, 2010, EnergySolutions notified the Utah Division of Radiation Control (UDRC) of a non-compliance issue at the EnergySolutions Low-Level Radioactive Waste Disposal Facility in Clive, Utah. The purpose of the letter was to inform the Executive Secretary of the Utah Radiation Control Board of multiple shipments with containers containing waste exceeding Class A waste limits that were accepted and disposed at the Clive facility. As a result of the investigation, violations of the Utah Radiation Control Rules were identified. The authority for this proposed action is Utah Code Annotated (1953, as amended) Section 19-3-109. The proposed penalties have been arrived at by using Rule R313-14 of the Utah Administrative Code (UAC). The particular violations and the associated proposed civil penalty are set forth below:

1. Utah Radiation Control Rule R313-26-6 states: "Generator Site Access Permittees shall be subject to the provisions of Rule R313-14 for violations of federal regulations, state rules or requirements in the current land disposal facility operating license regarding radioactive waste packaging, transportation, labeling, notification, classification, marking, manifesting or description."

License Condition 9.B of the receiving land disposal facility, EnergySolutions (Licensee), Radioactive Material License Number UT2300249, states: "In accordance with Utah Code Annotated 19-3-105, the Licensee may not receive Class B or Class C low-level radioactive waste without first receiving approval from the Executive Secretary of the Utah Radiation Control Board and also receiving approval from the Governor and the Legislature."

Contrary to this requirement, a radioactive waste shipment from CH2M Hill Plateau Remediation Company, (Permittee), was identified and confirmed by the Division of Radiation Control as exceeding Class A limits. The permittee misclassified and certified the waste that EnergySolutions received, accepted and disposed of as Class A. Shipment number 9079-08-0001S consisted of 76 drums and was described on the Nuclear Regulatory Commission (NRC) Uniform Low-Level Waste Manifest Form 541 as Class A unstable material. It was determined that the classification calculations of the material were based on the container gross weight, rather than the net weight of the waste regarding one container identified as RHZ-103-A-16907. Therefore, it was misclassified as Class A waste.

This violation is of significant concern and has been characterized as Severity Level III. The base penalty for this Severity Level is \$2,500.00.

Therefore, a civil penalty of \$2,500.00 is proposed.

In addition, in accordance with Utah Radiation Control Rule R313-26-6 the above violation was evaluated utilizing the Generator Site Access Permit Enforcement Policy. Accordingly, CH2M Hill Plateau Remediation Company, Generator Site Access Permit will be assessed 125 points for mischaracterization of the waste shipment.

2. Utah Radiation Control Rule R313-15-1006(3), which incorporates by reference federal regulation 10 CFR 20, Appendix G, Section II. *Certification*, requires the authorized representative of the waste generator to certify that the transported material is properly classified and described.

**UTAH RADIATION CONTROL BOARD
NOTICE OF VIOLATION
AND
NOTICE OF PROPOSED IMPOSITION OF CIVIL PENALTY**

Page 2

CH2M Hill Plateau Remediation Company
P.O. Box 1600 MS T4-08
Richland, WA 99352

Generator Site Access Permit No. 081 100 5000

Contrary to the above, the Permittee wrongly certified that the waste was classified as Class A.

This violation is characterized as a Severity Level IV. The base penalty for this Severity Level is \$750.00.

Therefore, a civil penalty of \$750.00 is proposed.

In accordance with Utah Radiation Control Rule R313-26-6 the above violation was evaluated utilizing the Generator Site Access Permit Enforcement Policy. Accordingly, CH2M Hill Plateau Remediation Company, Generator Site Access Permit will be assessed 100 points for failure to execute the required shipper's certification.

Regarding the civil penalties, the licensee may within 30 days of receipt of this Notice, pay the civil penalty in the amount of \$3,250.00, or may protest the imposition of the civil penalties in whole or in part by written answer. Should the permittee fail to answer in the time specified, the Utah Radiation Control Board will issue an order imposing a civil penalty in the amount proposed.

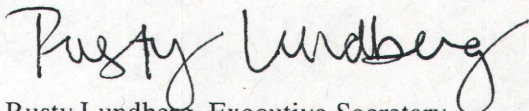
The DRC requires corrective actions be provided if you choose to renew your Generator Site Access Permit. Any reply to the Notice of Violation should include, for each violation: (1) the corrective steps which have been taken and the results achieved; (2) the corrective steps which have been taken to prevent recurrence; and (3) the date full compliance will be achieved. A response protesting the Imposition of Civil Penalties shall include: (1) an admission or denial of the item of non-compliance; (2) a demonstration of extenuating circumstances; (3) a showing of error in the Notice of Violation; or (4) other reasons why the penalty should not be imposed.

Your response or written answer to this Notice of Violation/Notice of Proposed Imposition of Civil Penalty shall be addressed to Rusty Lundberg, Executive Secretary, Utah Radiation Control Board, 195 North 1950 West, P.O. Box 144850, Salt Lake City, Utah 84114-4850. The licensee's attention is directed to the Administrative Procedures set forth in Utah Code Annotated (UCA) 63G-4. If a hearing is requested, the Executive Secretary of the Utah Radiation Control Board will designate the time and place of the hearing.

Upon failure to pay any civil penalty due which has been subsequently determined in accordance with the applicable provisions of UCA 19-3-109 and R313-14, the matter may be referred to the Attorney General, and the civil penalty may be collected by civil action pursuant to UCA 19-3-109(5).

Dated at Salt Lake City, Utah
This 20th day of January, 2011

UTAH RADIATION CONTROL BOARD



Rusty Lundberg, Executive Secretary

UNIFORM LOW-LEVEL RADIOACTIVE
WASTE MANIFEST
SHIPPING PAPER (CONTINUATION)

U.S. NUCLEAR REGULATORY COMMISSION

B. Manifest Number

(9079-08-0001S) /ST003 / 001547446JJK

PAGE 3 OF 7 PAGE(S)

11. U.S. DEPARTMENT OF TRANSPORTATION DESCRIPTION (Including proper shipping name, hazard class, UN ID number, and any additional information)	12. DOT LABEL "RADIOACTIVE"	13 TRANSPORT Hazard Class	14 PHYSICAL AND CHEMICAL HAZARD	15 RADIOACTIVE NUCLEIDES	16 TOTAL NET WEIGHT MAY / TWC CLASS	17 LSA-II CLASS	18 TOTAL NET WEIGHT MAY / TWC CLASS	19 OR VOLUME (LBS.)	20 NATURE OF PACKAGING
RA, Radioactive material, low specific activity (LSA-II); 7: UN3321; Fissile Excepted: (PCB's)	Not Applicable	Not Applicable	Liquid, Mixture	Pu-239, Pu-240, Am-241, Pu-238	2,20E+01 5,35E-01	LSA-II	78 172		RHZ-103-A16843
Waste Radioactive material, low specific activity (LSA-II); 7: (3); UN3321; Fissile Excepted	Not Applicable	Not Applicable	Liquid, Mixture	Pu-239, Am-241, Pu-240, Pu-238	7,11E+00 1,92E-01	LSA-II	54 119		RHZ-103-A16858
Radioactive material, low specific activity (LSA-II); 7: UN3321; Fissile Excepted	Not Applicable	Not Applicable	Liquid, Mixture	Pu-239, Am-241, Pu-240, Pu-238	7,11E+00 1,92E-01	LSA-II	56 123		RHZ-103-A16860
RA, Waste Radioactive material, low specific activity (LSA-II); 7: (3); UN3321; Fissile Excepted: (PCB's)	Not Applicable	Not Applicable	Liquid, Mixture	Pu-239, Am-241, Pu-240, Pu-241	9,65E+01 2,61E+00	LSA-II	85 187		RHZ-103-A16907
Radioactive material, low specific activity (LSA-II); 7: UN3321; Fissile Excepted	Not Applicable	Not Applicable	Liquid, Mixture	Pu-239, Pu-240, Pu-241, Pu-238	2,08E+00 5,63E-02	LSA-II	59 130		RHZ-213-A16943
Radioactive material, low specific activity (LSA-II); 7: UN3321; Fissile Excepted	Not Applicable	Not Applicable	Liquid, Mixture	Pu-239, Pu-240	4,56E+00 1,26E-01	LSA-II	82 181		RHZ-213-A19440
Radioactive material, low specific activity (LSA-II); 7: UN3321; Fissile Excepted	Not Applicable	Not Applicable	Liquid, Mixture	Pu-239, Pu-240, Pu-241, Pu-238	1,71E+03 4,61E-05	LSA-II	77 170		RHZ-213-920405
Radioactive material, low specific activity (LSA-II); 7: UN3321; Fissile Excepted	Not Applicable	Not Applicable	Liquid, Mixture	Pu-239, Pu-240, Pu-241, Pu-238	1,71E+03 4,61E-05	LSA-II	77 170		RHZ-213-920406
Radioactive material, low specific activity (LSA-II); 7: UN3321; Fissile Excepted	Not Applicable	Not Applicable	Liquid, Mixture	Pu-239, Pu-240, Pu-241, Pu-238	7,03E+04 1,90E-05	LSA-II	30 110		RHZ-213-920407
RA, Waste Radioactive material, low specific activity (LSA-II); 7: (3); UN3321; Fissile Excepted: (PCB's)	Not Applicable	Not Applicable	Liquid, Mixture	Pu-239, Am-241, Pu-240, Pu-238	3,20E+01 8,65E-01	LSA-II	83 183		RHZ-213-A16869
Waste Radioactive material, low specific activity (LSA-II); 7: (3); UN3321; Fissile Excepted	Not Applicable	Not Applicable	Liquid, Mixture	Pu-239, Pu-240, Pu-241, Pu-238	1,45E+02 3,92E-00	LSA-II	142 313		RHZ-213-A16928
Waste Radioactive material, low specific activity (LSA-II); 7: (3); UN3321; Fissile Excepted	Not Applicable	Not Applicable	Liquid, Mixture	Pu-239, Am-241, Pu-240, Pu-238	5,70E+00 1,54E-01	LSA-II	83 139		RHZ-213-A16956

40 (Rev. 10-80)

CONSIGNEE ORIGINATOR

UNIFORM LOW-LEVEL RADIOACTIVE WASTE MANIFEST
CONTAINER AND WASTE DESCRIPTION (CONTINUATION)

2. MANIFEST NUMBER
(9079-08-0001S) / ST003 / 001547746JUK

Page 4 of 13 Total Pages

DISPOSAL CONTAINER DESCRIPTION										WASTE DESCRIPTION FOR EACH WASTE TYPE IN CONTAINER									
CONTAINER ID # / GEN ID #	CONTAINER DESCRIPTION	VOLUME (m³)	DATE AND TIME (mm/dd/yyyy)	RADIONUCLIDE LEVEL (µSv/hr)	CONTAMINATION LEVEL (mSv/hr)	CONTAMINATION LEVEL (mSv/hr)	CONTAMINATION LEVEL (mSv/hr)	CONTAMINATION LEVEL (mSv/hr)	CONTAMINATION LEVEL (mSv/hr)	PHYSICAL DESCRIPTION									
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